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June 24, 2024

Honorable Valerie Figueredo United States Magistrate Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007 Letter Motion: Extension of Time Request

Re: Jose Fernando Roldan v. Comm'r of SSA 1:24-cv-02145-VF

Dear Honorable Judge Figueredo:

Pursuant to the Scheduling Order in the above referenced case, Plaintiff's motion for Judgment on the Pleadings is due on June 27, 2024. Due to an influx of CAR filings and and upcoming leave, counsel has encountered conflicts on the briefing calendar. Plaintiff therefore writes to respectfully request that the date for Plaintiff's Opening Brief be adjourned for sixty days. After consultation with the Defendant, he has given consent and asks for similar extensions as noted in the following proposed revised briefing schedule.

- Plaintiff's brief shall be filed by August 26, 2024;
- Defendant's brief shall be filed by October 25, 2024; and
- Plaintiff's reply shall be filed by November 15, 2024.

Thank you in advance for the Court's consideration of this request.

Respectfully Submitted,

/s/Eddy Pierre Pierre Eddy Pierre Pierre, Esq. Attorney for Plaintiff (646) 992-8383

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Cc: Jonathan King, Esq. (Via ECF) Attorney for Defendant. **MEMO ENDORSED**

HON. VALERIE FIGUEREDO UNITED STATES MAGISTRATE JUDGE

DATED: June 25, 2024

An extension is hereby granted. Plaintiff's deadline to submit its brief is now September 9, 2024. Accordingly, the Defendant's brief is due by November 1, 2024 and Plaintiffs reply is due December 2, 2024. The Clerk of Court is respectfully directed to terminate and remove the viewing restrictions on Motion at ECF No. 15.